

Village of Elk Grove Village, Illinois - EGTv

August 5, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

The Village of Elk Grove Village, Illinois submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Under the direction of the Village Manager's Office, Cable Services administers, produces, programs and promotes the Village's municipal access cable channel, EGTv Channel 6. Primary responsibilities include:

- Creation, production, post-production, promotion and scheduling of programming highlighting Village policies, procedures and events including live coverage of Village Board Meetings, Park Board Meetings and other live programming.
- Creation and scheduling of Village and community messages on the channel's Announcements Board, which is shown when programming is not being cablecast.
- Provide video services (duplication, technical assistance, etc.) to Village departments.

We carry 111 different programs on our channel of which 53 are closed captioned including programs from the U.S. Armed Forces, United States Postal Service, American Democracy Television, U.S. Department of Commerce, Live Response and other programs both local and national. The on-screen program guide of our multichannel video programming distributor (MVPD), Comcast, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast lists our programming as "government programming" with no additional titles or descriptions. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what

our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Our community is also served by AT&T's Uverse multichannel video service, which has created unique and especially difficult problems for visually impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, The Alliance for Community Media, and Chicago Access Corporation (CAN-TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number (in our case channels 6, 18, and 19) with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate. In our area, AT&T has 79 different local jurisdictions, and a total of over 100 different PEG channels on its "channel 99" PEG application. As a result, a visually impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu with 79 different local community jurisdictions, find and press the correct one, and then visually navigate a sub-menu of over 100 different PEG channels, find and press the correct one to reach the PEG channel they want. Moreover, AT&T's PEG product's lack of a truly effective "last channel" function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another. In short, the visually impaired are genuinely and dramatically disadvantaged compared to the non-visually impaired in accessing and being able to have the same functionality with respect to our PEG channels on AT&T's Uverse system.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Ross Rowe, Cable Production Coordinator

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